

UNITED STATES DISTRICT COURT

for the

District of South Carolina

United States of America

v.

Eduar FLORES Reyes a.k.a. Edward Reyes,
Edward Flores Reyes

Case No.

2:25-mj-00014

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2, 2025 in the county of Charleston in the
 District of South Carolina, the defendant(s) violated:*Code Section*Title 8, United States Code,
Sections 1326(a) & (b)(2)*Offense Description*

Did knowingly and unlawfully enter and was found in the United States of America, not having obtained the express consent of the Attorney General or Secretary of Homeland Security to reapply for admission thereto; said defendant then being an alien who had been previously deported from the United States to Mexico on August 10, 2022, subsequent to a conviction for an aggravated felony, in violation of Title 8, United States Code, Sections 1326(a) & (b)(2).

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

BRADLEY T LONG

Digitally signed by BRADLEY T LONG
Date: 2025.03.17 11:48:28 -04'00'*Complainant's signature*

Bradley Long, Deportation Officer

*Printed name and title*Sworn to me via telephone or other reliable electronic means
and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d).Date: 03/17/2025City and state: Charleston, South Carolina*Mary Gordon Baker*
Judge's signature

Mary Gordon Baker, U.S. Magistrate Judge

Printed name and title

STATE OF SOUTH CAROLINA }
COUNTY OF CHARLESTON }

AFFIDAVIT

I, Bradley Long, being first duly sworn, hereby depose and state as follows:

1. I am employed as a Deportation Officer with the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO). I have been employed with ICE ERO since May 2009. During that time, I have received training through the ICE Basic Immigration Law Enforcement Training Program at Glynco, GA and I have conducted investigations into both criminal and administrative matters involving violations of the United States Immigration and Nationality Act. My responsibilities include identifying and investigating illegal aliens with criminal histories that are subject to criminal prosecution, including violations of 8 U.S.C. § 1326;
2. That the information contained in this affidavit is based on my personal participation in this investigation and from information provided to me by other law enforcement officers. As this affidavit is being submitted for the limited purpose of establishing probable cause to support the arrest of Eduar FLORES Reyes, a.k.a. Edward Reyes, Edward Flores Reyes, a citizen and national of Mexico, for violations of federal law, including, but not limited to: 8 U.S.C. § 1326(a) & (b)(2). I have not included each and every fact known to me concerning this investigation and have set forth only those facts that I believe are necessary for said purpose;
3. On or about January 24, 2001, FLORES Reyes illegally entered the United States, at or near Topawa, Arizona and was apprehended by United States Border Patrol Agents (USBP) and Voluntarily Returned to Mexico on the same date;
4. On or about an unknown date, FLORES Reyes illegally entered the United States, at or near an unknown location;
5. On or about December 9, 2020, FLORES Reyes was encountered by ICE Officers while incarcerated in the Albemarle-Charlottesville Police Department, Charlottesville, Virginia, after being arrested for a Fugitive: On Felony W/O Warrant-Extradition. It was determined through database checks, FLORES Reyes had entered the United States without being inspected, paroled, or admitted by an Immigration Officer, and being a citizen or national of Mexico. FLORES Reyes's fingerprints were obtained and were a confirmed biometric match for FBI number 263252CH4. On that same date, an immigration detainer was lodged with the Albemarle-Charlottesville Police Department for FLORES Reyes;
6. On or about January 7, 2021, FLORES Reyes was encountered by ICE Officers while incarcerated in the Sheriff Al Cannon Detention Center, North Charleston, South Carolina, after being extradited from Virginia and charged with Criminal Sexual Conduct With/Minor (11-14 years) – 2nd Degree. FLORES Reyes was interviewed and questioned regarding his immigration status in the United States and admitted to entering the United States without being inspected, paroled, or admitted by an Immigration Officer, and being

a citizen and national of Mexico. FLORES Reyes's fingerprints were obtained and were a confirmed biometric match for FBI number 263252CH4. On that same date, an immigration detainer was lodged with the Sheriff Al Cannon Detention Center. However, this detainer was not honored. At this time, FLORES Reyes was assigned Alien Registration Number A216 666 818;

7. On or about July 11, 2022, FLORES Reyes was convicted in the Court of General Sessions, in the County of Charleston, of Criminal Sexual Conduct With A Minor, Second Degree and sentenced to 552 days imprisonment and made to pay a \$128.75 fine. This conviction is considered an Aggravated Felony;
8. On or about July 12, 2022, FLORES Reyes was apprehended by ICE Officers after he was released from the Sheriff Al Cannon Detention Center, North Charleston, South Carolina, after serving 552 days for a conviction for Criminal Sexual Conduct With A Minor, Second Degree. FLORES Reyes was interviewed and questioned regarding his immigration status in the United States and admitted to entering the United States without being inspected, paroled, or admitted by an Immigration Officer, and being a citizen and national of Mexico. FLORES Reyes's fingerprints were obtained and were a confirmed biometric match for FBI number 263252CH4. On that same date, FLORES Reyes was served with a Notice of Intent to Issue a Final Administrative Removal Order, form I-851. On that same date, an Immigration Official in Charleston, South Carolina, ordered FLORES Reyes to be removed to Mexico;
9. On or about August 10, 2022, the Order of Removal was executed, whereby FLORES Reyes was removed from the United States to Mexico. On that day, FLORES Reyes surrendered his fingerprint and photo for immigration form I-205 (Warrant of Removal/Deportation), which he signed. FLORES Reyes's departure was witnessed and signed by an Immigration Officer;
10. On or about and unknown date, FLORES Reyes illegally entered the United States, at or near an unknown location;
11. On or about January 2, 2025, FLORES Reyes was encountered by ICE Officers while incarcerated in the Sheriff Al Cannon Detention Center, North Charleston, South Carolina, after he was arrested for Hit and Run Accident With Property Damage, and Driving Without a License. FLORES Reyes's fingerprints were obtained and were a confirmed biometric match for FBI number 263252CH4. FLORES Reyes was released from local custody before an ICE detainer could be lodged against him with the Sheriff Al Cannon Detention Center;
12. On or about March 7, 2025, FLORES Reyes was apprehended by ICE Officers after leaving his residence located at 2000 Gumwood Boulevard, North Charleston, South Carolina. FLORES Reyes was interviewed and questioned regarding his immigration status in the United States and admitted to entering the United States without being inspected, paroled, or admitted by an Immigration Officer, and being a citizen and national of Mexico. FLORES Reyes's fingerprints were obtained and were a confirmed biometric

match for FBI number 263252CH4. On that same date, FLORES Reyes was served with a Notice of Intent/Decision to Reinstate Prior Order, form I-871;

13. A Record check in the Computer Linked Application Informational Management System (CLAIMS) revealed no record of FLORES Reyes filing an application for permission to reapply for admission into the United States or from the Secretary of Homeland Security, for re-admission into the United States as required by law. On March 7, 2025, a request was made of the United States Citizenship and Immigration Services to confirm that no record of application existed by issuing a certificate of nonexistence of record;
14. Based on the foregoing, I submit there is probable cause to believe that Eduar FLORES Reyes, is in violation of 8 U.S.C. § 1326(a) & (b)(2), in that, on or about January 2, 2025, in the County of Charleston in the District of South Carolina, he did knowingly and unlawfully enter and/or was found in the United States of America, not having obtained the express consent of the Attorney General or Secretary of Homeland Security to reapply for admission thereto; said defendant then being an alien who previously had been deported from the United States to Mexico, on August 10, 2022.

This Affidavit has been reviewed by AUSA Dean H. Secor.

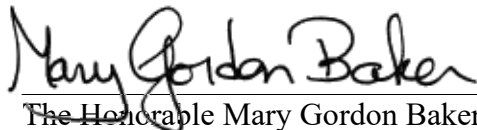
BRADLEY T LONG

Digitally signed by BRADLEY T LONG
Date: 2025.03.17 11:45:42 -04'00'

Bradley Long, Deportation Officer
United States Immigration and Customs Enforcement

SWORN TO ME VIA TELEPHONE OR
OTHER RELIABLE ELECTRONIC MEANS
AND SIGNED BY ME PURSUANT TO
FED. R. CRIM. P. 4.1 AND 4(d) OR 41(d)(3),
AS APPLICABLE.

This 17th day of March 2025
Charleston, South Carolina



The Honorable Mary Gordon Baker
United States Magistrate Judge